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13 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S OPPOSITION
TO LYFT INC.'S MOTION TO
QUASH SUBPOENA**

Date: TBD
Time: TBD
Crtrm.: F – 15th Floor
Judge: The Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendants' Opposition to Lyft Inc.'s Motion to Quash Subpoena.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of the *New York Times*
7 article, "Lyft and Waymo Reach Deal to Collaborate on Self-Driving Cars," dated May 14, 2017.

8 3. On June 13, 2017, Uber and Lyft met and conferred with the Special Master, the
9 Special Master noted that the protective order in this case provides a level of confidentiality that
10 limits access to outside counsel and a limited number of in-house counsel.

11
12 I declare under penalty of perjury that the foregoing is true and correct. Executed this
13 20th day of June, 2017 at Washington, D.C.

14
15 /s/ Michelle Yang

Michelle Yang

16
17
18 **ATTESTATION OF E-FILED SIGNATURE**

19 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
20 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has
21 concurred in this filing.

22 Dated: June 20, 2017

23 /s/ Arturo J. González

Arturo J. González